UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF ILLINOIS

MICHAEL MOSS, individually and on)	
behalf of all others similarly situated,)	
Plaintiff,)	
V.)	Case No.: 1:16-cv-08496
UNITED AIRLINES, INC.; UNITED CONTINENTAL HOLDINGS, INC.; UNITED AIR LINES, INC.; AND CONTINENTAL AIRLINES, INC.)))	Hon. Thomas M. Durkin
Defendants.)	

ORDER GRANTING PLAINTIFF'S MOTION FOR ATTORNEYS' FEES, COSTS, AND INCENTIVE AWARD

The Court, having reviewed Plaintiff's Motion for Attorneys' Fees, Costs, and Incentive Award, the pleadings and other papers on file in this action, and the statements of counsel and the parties, hereby finds that Plaintiff's Motion should be GRANTED.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. The Court finds that Plaintiff's requested fee award of \$84,116 is fair and reasonable in light of the results obtained by Class Counsel in this case relating to the LOA 38 Claim; the risks and complex issues involved, and the skill and high-quality work required to overcome them; the burdens borne by counsel in pursuing this litigation on a pure contingency

basis; and the range of awards made in similar cases. The Court further finds the requested fee

award comports with the applicable law and is justified by the circumstances of this case.

3. The Court has confirmed the reasonableness of the fee request by conducting a

lodestar cross-check. The Court finds that Class Counsel's lodestar relating to the LOA 38 Claim,

as of the date of the Motion for Attorneys' Fees, Costs, and Incentive Awards, was \$179,690,

based on their current hourly rates is reasonable.

4. The Court finds that Plaintiff's counsel incurred \$18,551 in litigation costs and

expenses as of the date they filed their Motion for Attorneys' Fees, Costs, and Incentive Awards.

The Court finds that these costs and expenses were reasonably incurred in the ordinary course of

prosecuting this case and were necessary given the nature and scope of the case. Accordingly, the

Court approves payment to counsel in the amount of \$18,551 for reimbursement of costs and

expenses.

5. Finally, the Court approves an incentive award of \$2,000 to Plaintiff. This incentive

award is reasonable and justified given: (1) the risks – reputational, financial, and otherwise –

faced by Plaintiff in bringing this lawsuit; and (2) the work performed and the active participation

in the litigation and settlement processes by the Plaintiff on behalf of the Class Members.

6. The attorneys' fees, costs, and incentive awards set forth in this Order shall be paid

by Defendants in accordance with the terms of the Settlement Agreement.

Dated: August 19, 2020

Hon. Thomas M. Durkin

U.S. District Judge

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